

EXHIBIT I

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MASSACHUSETTS

3 STEVEN G. WICKS, GERALD A.)
4 KALBFLEISCH, MICHAEL and)
5 MYRTLE HATHAWAY,)
6)
7)
8)
9)
10 vs.) Civil Action
11) No. 04-10988-GAO

12 PUTNAM INVESTMENT MANAGEMENT,)
13 LLC, and PUTNAM RETAIL)
14 MANAGEMENT LIMITED PARTNERSHIP,)
15)

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Defendants.)

DEPOSITION OF GERALD KALBFLEISCH, produced,
sworn, and examined on FEBRUARY 13, 2007, between
the hours of eight o'clock in the forenoon and
six o'clock in the afternoon of that day, at the
offices of Bryan Cave, LLP, One Metropolitan
Square, 211 North Broadway, Suite 3600, St.
Louis, Missouri 63102 before Tammie A. Heet, a
Registered Professional Reporter, Certified
Shorthand Reporter and Notary Public within and
for the states of Illinois and Missouri, in a
certain cause now pending in the United States
District Court, District of Massachusetts, in re:
STEVEN G. WICKS, et al. vs. PUTNAM INVESTMENT
MANAGEMENT, LLC, et al.; on behalf of the
Defendant Putnam.

1 A. No.
 2 Q. Where do you live, sir?
 3 A. I live in Belleville, Illinois.
 4 Q. How long have you lived there?
 5 A. 47 years.
 6 Q. How old are you, sir?
 7 A. I'll be 70 on the 23rd of February.
 8 Q. Are you retired?
 9 A. Yes, I am.
 10 Q. And when did you retire?
 11 A. July 1995.
 12 Q. And where were you employed
immediately before that?
 13 A. I was with the electrical workers
for 40 years. Different contractors.
 14 Q. What kind of work did you do?
 15 A. Wireman work, wiring buildings
similar to this.
 16 Q. Similar to the office tower we're
in today?
 17 A. Well, I've never worked on anything
this big, but like houses and a lot of rehab at
Scott Air Force Base and just -- just different
types of jobs altogether.
 25 Q. When were you last outside the

1 Exhibit 21, Mr. Kalbfleisch. This is a document
2 that was produced from your files in this
3 litigation. We can tell that because of the
4 number in the lower right-hand corner, KAL 001
5 and 002.
 6 And is this an account statement
7 that you received from a brokerage service with
8 respect to certain investments that you own?
 9 A. Correct.
 10 Q. And if you look in the upper
11 left-hand corner, you'll see this covers the year
12 2002; is that right?
 13 A. Correct.
 14 Q. And in the mutual fund category
15 there are a number of Putnam mutual funds
16 identified there, including the Classic Equity
17 and the Investors fund and the Voyager 2 fund.
 18 Do you see that there, sir?
 19 A. Correct.
 20 Q. And this is the first document,
21 both numeric and also chronological order, that's
22 been produced from your files. Do you know how
23 long before 2002 you had owned Putnam mutual
24 funds?
 25 A. Not to my recollection. I can't

1 states of Illinois or Missouri?
 2 A. Let's see. That would be September
3 2006.
 4 Q. And where did you go?
 5 A. San Diego.
 6 Q. Did you fly there?
 7 A. Yes, I did.
 8 Q. How long did you spend in San
9 Diego?
 10 A. One week.
 11 Q. And is there any reason why, if the
12 deposition had been in Boston instead of
13 St. Louis, you couldn't have flown to Boston?
 14 A. No reason.
 15 Q. What is your level of education?
 16 A. High school, and apprenticeship
17 program in electrical.
 18 Q. When did you first invest in any
19 Putnam mutual funds?
 20 A. I'm not quite sure.
 21 Q. What's your best recollection?
 22 A. I'm really not sure.
 23 (Exhibit 21 was marked for
identification by the reporter.)
 25 Q. (BY MR. SIMSHAUSER) Showing you

1 remember.
 2 Q. Would it have been a period of
3 years?
 4 A. I would think. I'm not positive.
 5 Q. Would it have been sometime during
6 the 1990s that you first bought Putnam mutual
7 funds?
 8 A. It's possible. I didn't document
9 too much.
 10 Q. Would that be your best
11 recollection, it was sometime during the 1990s?
 12 A. Late '90s, I would think.
 13 Q. And how did you come to buy Putnam
14 mutual funds?
 15 A. Through my investment broker.
 16 Q. Who is that?
 17 A. Susan Normansell from UMB Scott
18 Brokerage.
 19 Q. Could you spell her name, please?
 20 A. Can I look at her card? I brought
21 it with me. N-O-R-M-A-N-S-E-L-L. Susan.
 22 Q. What firm is she with?
 23 A. UMB Scott brokerage service.
 24 Q. How long have you worked with
25 Ms. Normansell?